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Attorneys for Defendant
BMW OF NORTH AMERICA, LLC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

DANIEL CERVANTES, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

BMW OF NORTH AMERICA, LLC, a
Delaware limited liability company; and
DOES 1 to 10, inclusive,

Defendants.

Case No. 2:21-cv-01807-TLN-KJN

[Hon. Troy L. Nunley]

**JOINT STIPULATION TO EXTEND
TIME FOR DEFENDANT BMW OF
NORTH AMERICA, LLC TO RESPOND
TO INITIAL COMPLAINT**

Complaint Served: October 6, 2021
Current Response Date: November 24, 2021
New Response Date: December 22, 2021

1 WHEREAS, Plaintiff Daniel Cervantes (“Plaintiff”) filed his Complaint on September 30,
2 2021;

3 WHEREAS, Defendant BMW of North America, LLC (“Defendant”) (Plaintiff and
4 Defendant collectively referred to as the “Parties”) was served on October 6, 2021 such that
5 Defendant’s current responsive pleading deadline is October 27, 2021;

6 WHEREAS, through the Parties’ prior stipulation, Defendant’s current response deadline
7 is November 24, 2021;

8 WHEREAS, Defendant is in the process of assessing Plaintiff’s allegations in this action
9 which is a time-consuming process given the highly technical nature of the allegations relating to
10 the accessibility of Defendant’s website; and

11 WHEREAS, the Parties’ respective counsel have met and conferred and stipulated to a 28-
12 day extension of time for Defendant to respond to Plaintiff’s Complaint.

13 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through the
14 Parties’ respective counsel as follows:

15 Defendant’s deadline to file a responsive pleading to Plaintiff’s Complaint shall be
16 extended by 28 calendar days to December 22, 2021.

17 Dated: November 22, 2021

WILSHIRE LAW FIRM

18 By /s/ Thiago Coelho

19 Thiago Coelho

Attorney for Plaintiff

DANIEL CERVANTES

20 Dated: November 22, 2021

MORGAN, LEWIS & BOCKIUS LLP

21 By /s/ Kathy H. Gao

22 KATHY H. GAO

Attorney for Defendant

23 BMW OF NORTH AMERICA, LLC

SIGNATURE ATTESTATION

I hereby attest that all signatories listed above, on whose behalf this stipulation is submitted, concur in the filing's content and have authorized the filing.

Dated: November 22, 2021

MORGAN, LEWIS & BOCKIUS LLP

By /s/ Kathy H. Gao

KATHY H. GAO

Attorney for Defendant

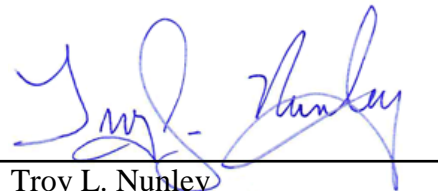
BMW OF NORTH AMERICA, LLC

ORDER

After considering the Parties' stipulation and good cause appearing, IT IS HEREBY ORDERED that: Defendant's deadline to respond to Plaintiff's Complaint shall be extended to December 22, 2021.

IT IS SO ORDERED.

Dated: 11/23/2021



Troy L. Nunley
United States District Judge